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U.S. DISTRICT COURT
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DISTRICT OF UTAH
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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROBERT WAYNE FOLSOM,

Defendant.

INDICTMENT

VIOLATIONS:

18 U.S.C. § 2423(b)

(Travel with Intent to Engage in Illicit
Sexual Conduct) (Counts 1, 2, 3);

18 U.S.C. § 2422(b)

(Coercion and Enticement)

(Count 4)

The Grand Jury Charges:

Case: 1:15-cr-00085
Assigned To : Parrish, Jill N.
Assign. Date : 11/10/2015
Description: USA v.

COUNT 1

Travel with Intent to Engage in Illicit Sexual Conduct
(18 U.S.C. § 2423(b))

On a date unknown to the Grand Jury between on or about February 1, 2015, and on
or about February 28, 2015, in the Central Division of the District of Utah and elsewhere,

ROBERT WAYNE FOLSOM,

defendant herein, traveled in interstate commerce for the purpose of engaging in illicit sexual
conduct with K.B., as defined in 18 U.S.C. § 2423(f); all in violation of 18 U.S.C. § 2423(b).

COUNT 2

Travel with Intent to Engage in Illicit Sexual Conduct
(18 U.S.C. § 2423(b))

On a date unknown to the Grand Jury between on or about May 1, 2015, and on or about May 29, 2015, in the Central Division of the District of Utah and elsewhere,

ROBERT WAYNE FOLSOM,

defendant herein, traveled in interstate commerce for the purpose of engaging in illicit sexual conduct with K.B., as defined in 18 U.S.C. § 2423(f); all in violation of 18 U.S.C. § 2423(b).

COUNT 3

Travel with Intent to Engage in Illicit Sexual Conduct
(18 U.S.C. § 2423(b))

On or about July 24, 2015, in the Central Division of the District of Utah and elsewhere,

ROBERT WAYNE FOLSOM,

defendant herein, traveled in interstate commerce for the purpose of engaging in illicit sexual conduct with K.B., as defined in 18 U.S.C. § 2423(f); all in violation of 18 U.S.C. § 2423(b).

COUNT 4

Coercion and Enticement
(18 U.S.C. § 2422(b))

Between on or about February 1, 2015, and on or about July 24, 2015, in the Central Division of the District of Utah,

ROBERT WAYNE FOLSOM,

the defendant herein, did knowingly and intentionally, by means of a facility of interstate commerce, persuade, induce, entice, and coerce an individual, K.B., who had not attained the age of 18 years, to engage in sexual activity for which a person can be charged with a

criminal offense, and attempted to so persuade, induce, entice, and coerce; all in violation of
18 U.S.C. § 2422(b).

A TRUE BILL:

15/
FOREPERSON OF GRAND JURY

JOHN W. HUBER
United States Attorney

Holly R. Shick
HOLLY R. SHICK
Assistant United States Attorney